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— A NEW YORK LLC —

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OF COUNSEL
STEPHEN W. BEYER†

June 28, 2018

Via Efiling

Hon. P. Kevin Castel, U.S.D.J.
Southern District Court of New York
Daniel Patrick Moynihan US Courthouse
500 Pearl Street, Courtroom 11D
New York, New York 10007-1312

Re: Hartford Fire Ins. Co. a/s/o Klearwall Industries, Inc. v. Maersk Line, et al.
Civil Action No. 18-00121

Pre-Motion Letter

Dear Judge Castel:

Our office represents the plaintiff, Hartford Fire Ins. Co. a/s/o Klearwall Industries, Inc. regarding the above-captioned matter. Pursuant to Your Honor's Individual Rules of Practice, please accept this letter as plaintiff's **Pre-Motion Letter**.

The plaintiff, Hartford Fire Ins. Co. would like permission to file an Amended Complaint to add Sapsan, LLC, as a defendant in this matter. Further investigation in this matter reveals that Sapsan, LLC, who is located in Wallington, New Jersey, was the delivering motor carrier and thus, should be a party to this litigation.

I have discussed this matter with defendant, Maersk's attorney and I have brought it to the attention to the attorney for defendant, Albatrans, Inc., and they have consented to our Motion to Amend the Complaint to add Sapsan, LLC as a defendant in this action.

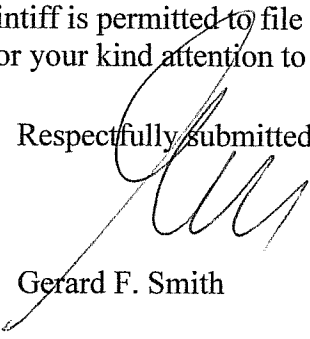
Notwithstanding the fact that plaintiff has consent from the parties, and pursuant to Your Honor's individual instructions, a briefing schedule for plaintiff's Motion to Amend Complaint is suggested, as follows:

Filing Deadline: July 12, 2018 (pursuant to 6/12/18 Scheduling Order)
Opposition due: July 22, 2018
Reply to Opposition: July 27, 2018
Motion Return Date: August 20, 2018

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Please advise the undersigned if plaintiff is permitted to file its Motion to Amend, at Your Honor's earliest convenience. Thank you for your kind attention to this matter.

Respectfully submitted,



Gerard F. Smith

GFS/rif

cc: James Ross, Esq.
Attorney for Defendant, Maersk Lines

Andrew Spector, Esq.
Troy Geisser, Esq.
Attorneys for Defendant, Albatrans, Inc.